

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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KATIE ELLEN PURIS,	:	Civil Action No. 1:24-cv-00944
	:	
Plaintiff,	:	<u>ORAL ARGUMENT REQUESTED</u>
	:	
- against -	:	NOTICE OF MOTION TO COMPEL
	:	ARBITRATION
TIKTOK INC., BYTEDANCE LTD.,	:	
BYTEDANCE INC., DOUYIN LIMITED,	:	
and LIDONG ZHANG,	:	
	:	
Defendants.	:	
	:	
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PLEASE TAKE NOTICE that upon the accompanying: (1) Memorandum of Law in Support of Motion to Compel Arbitration; (2) Declaration of Xu Ran with Exhibits A and B in Support of Motion to Compel Arbitration signed July 19, 2024; (3) Declaration of Diana Wu with Exhibit A and B signed July 19, 2024; and upon all the pleadings and proceedings herein, Defendants TikTok Inc., ByteDance Ltd., and ByteDance Inc. (collectively “Defendants”), by and through their counsel, Seyfarth Shaw LLP, will move this Court, at a date and time to be determined by the Court, before the Honorable Denise L. Cote, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order: (i) granting Defendants’ Motion to Compel Arbitration and (ii) granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to the Order by Judge Cote, dated July 1, 2024 (ECF No. 46) opposition papers are due August 9, 2024; and reply papers, if any are due August 23, 2024.

Dated: July 19, 2024

Respectfully Submitted,

SEYFARTH SHAW LLP

By: /s/ Ivan D. Smith
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*Attorneys for Defendants TikTok
Inc., ByteDance Ltd., and
ByteDance Inc.*

CERTIFICATE OF SERVICE

I, Ivan D. Smith, hereby certify that on July 19, 2024, I caused to be electronically filed true and correct copies of the foregoing NOTICE OF MOTION TO COMPEL ARBITRATION; MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT’S MOTION TO COMPEL ARBITRATION; DECLARATION OF XU RAN WITH EXHIBITS A THROUGH B IN SUPPORT OF DEFENDANT’S MOTION TO COMPEL ARBITRATION; AND DECLARATION OF DIANA WU WITH EXHIBIT A THROUGH B IN SUPPORT, with the Clerk of the Court via the Court’s CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Ivan D. Smith

Ivan D. Smith